



Vita Pharmica

The Best Choice for Your Health™

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February 14, 2005

CERTIFIED MAIL

Return Receipt Requested

FEB 23 2005

Dr. Robert J. Moore
Branch Chief, Compliance & Enforcement Branch
Office of Nutrition Products, Labeling and Dietary Supplements
FOOD & DRUG ADMINISTRATION (HFS-800)
5100 Paint Brush Parkway
College Park, Maryland 20740

Dear Dr. Moore:

This letter is submitted pursuant to Section 406 (r)(6) of the Federal Food, Drug, and Cosmetic Act for the purpose of notifying the Agency of statements being made in connection with the marketing of dietary supplements which are being distributed by this company.

The text of the statement that is being made is as follows:

Best Essentials promotes advanced cellular nutrition with 40 nutrients

Best Essentials has important nutrients your body needs every day. It contains higher levels of B vitamins, which help convert food into energy and help maintain healthy nervous system function. Plus, it contains antioxidants like lycopene, lutein, grape seed extract, pine bark extract and cranberry extract. **Best Essentials** also contains specific nutrients like Vitamins C, A, and E, Copper, Iron, Zinc, Selenium and Beta carotene to help you maintain a healthy immune system.

The name of the Product is as follows:

Best Essentials, 60 Tablets

The dietary ingredients for which this statement is being made are:

Vitamin A (from vitamin A palmitate and beta-carotene)
Vitamin C (as ascorbic acid and sodium ascorbate)
Vitamin D (as cholecalciferol)
Vitamin E (as dl-alpha tocopheryl acetate)
Vitamin K (as phytonadione)
Thiamin (as thiamin mononitrate)
Riboflavin
Niacin (as niacinamide)
Vitamin B6 (as pyridoxine HCl)
Folate (as folic acid)
Vitamin B12 (as cyanocobalamin)
Biotin
Pantothenic acid (as d-calcium pantothenate)
Calcium (as calcium carbonate and dicalcium phosphate)

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Iron (as ferrous fumarate)
Phosphorous (as dicalcium phosphate)
Iodine (as potassium iodide)
Magnesium (as magnesium oxide and magnesium borate)
Zinc (as zinc oxide)
Selenium (as sodium selenate)
Copper (as cupric oxide)
Manganese (as manganese sulfate)
Chromium (as chromium chloride)
Molybdenum (as sodium molybdate)
Potassium (as potassium chloride and potassium iodide)
Boron (as magnesium borate)
Silica (from silicon dioxide)
Vanadium (as sodium metavanadate)
Nickel (as nickelous sulfate)
Tin (as stannous chloride)
Lutein
Lecithin
DHA (Docosahexanoic acid)
Choline (as choline bitartrate)
Inositol
Lycopene
Citrus bioflavonoids
<i>Pinus strobes</i> L. bark extract (Pine bark extract)
<i>Vitis vinifera</i> L., seed (grape seed extract)
Cranberry fruit extract

As required, enclosed are two additional copies of this notification.

The signee certifies that the information contained in this notice is complete and accurate, and that Vitapharmica has substantiation that the statement being made is truthful and not misleading.

Sincerely,

Dr. Stephen M. Paul, PhD
President
Vitapharmica, Inc.

Enclosures